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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)) Master File No. 3:07-5944-SC
ANTITRUST LITIGATION) Individual Docket No. 13-cv-1173-SC
)
) MDL No. 1917

This Document Relates to:)
)
Sharp Electronics Corp. et al. v. Hitachi, Ltd.) STIPULATION AND [PROPOSED]
et al., No. 13-cv-01173.) ORDER RE THOMSON SA'S AND
) THOMSON CONSUMER
) ELECTRONICS, INC.'S RESPONSE TO
) THE FIRST AMENDED COMPLAINT
) OF PLAINTIFFS SHARP
) ELECTRONICS CORPORATION AND
) SHARP ELECTRONICS
) MANUFACTURING COMPANY OF
) AMERICA, INC.

1 Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company
2 of America, Inc. (collectively, "Sharp") and specially-appearing Defendant Thomson SA (n/k/a
3 Technicolor SA)¹ and Defendant Thomson Consumer Electronics, Inc. (n/k/a Technicolor USA, Inc.)
4 (collectively, "Thomson") enter into this Stipulation concerning the matter entitled *Sharp Electronics*
5 *Corp. et al. v. Hitachi, Ltd. et al.*, No. 13-cv-01173, which was related to *In re Cathode Ray Tube (CRT)*
6 *Antitrust Litigation*, No. 07-cv-05944, (the "MDL Proceedings") by an Order of Judge Samuel Conti on
7 March 26, 2013.

8 SUBJECT TO THE COURT'S APPROVAL, THE PARTIES STIPULATE AND
9 AGREE AS FOLLOWS:

10 WHEREAS, on October 28, 2013, Sharp filed its First Amended Complaint (Dkt. 64;
11 MDL Dkt. 2030); and

12 WHEREAS, Sharp and Thomson have agreed on a schedule for Thomson's answer to or
13 motion to dismiss Sharp's First Amended Complaint.

14 NOW, THEREFORE, PURSUANT TO LOCAL RULE 6-1(b), SHARP AND
15 THOMSON, BY AND THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY
16 STIPULATE AS FOLLOWS:

17 1. Thomson's answer to (or motion to dismiss) Sharp's First Amended Complaint shall
18 be due by November 22, 2013;

19 2. Sharp's response to any motion to dismiss shall be due by December 20, 2013; and

20 3. Thomson's reply brief shall be due by January 10, 2014.

21 **IT IS SO STIPULATED**

22 Dated: November 4, 2013

23 By: /s/ Jonathan A. Patchen
Stephen E. Taylor (SBN 058452)
Jonathan A. Patchen (SBN 237346)
TAYLOR & COMPANY LAW OFFICES, LLP

24
25
26 ¹ By entering into this Stipulation, specially-appearing Defendant Thomson S.A. does not waive its right
27 to assert any defense to Sharp's First Amended Complaint, including without limitation, that Thomson
S.A. is not subject to the personal jurisdiction of this Court. Thomson S.A. had filed a motion to dismiss
Sharp's First Complaint for lack of personal jurisdiction, but that motion was fully briefed and still
pending when Sharp filed its First Amended Complaint.

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25 *Attorney for Specially-Appearing Defendant Thomson SA*
26 *and Defendant Thomson Consumer Electronics, Inc.*

27 Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document

18 has been obtained from each of the above signatories.

19 Dated: November 4, 2013 /s/ Jonathan A. Patchen

20 Dated: 11/07, 2013

